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17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 OAKLAND DIVISION
20

21 ROSA MARTINEZ, JIMMY HOWARD,
ROBERTA DOBBS, BRENT
22 RODERICK, SHARON ROZIER, and
JOSEPH SUTRYNOWICZ, on behalf of
23 themselves and all others similarly situated,

24 Plaintiffs,

25 vs.

26 MICHAEL J. ASTRUE, Commissioner of
Social Security, in his official capacity,

27 Defendant.
28

CASE NO. 08-CV-4735 CW

**STIPULATION AND [PROPOSED]
ORDER SETTING ACCELERATED
BRIEFING AND HEARING SCHEDULE
ON MOTION TO INTERVENE
(LOCAL RULE 6-2)**

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14 Of Counsel for Plaintiffs ROSA MARTINEZ,
JIMMY HOWARD, ROBERTA DOBBS, BRENT
15 RODERICK, SHARON ROZIER, JOSEPH
SUTRYNOWICZ, and all others similarly situated
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1 WHEREAS, on August 12, 2009, the Court granted preliminary approval of the
2 proposed class action settlement in this case;

3 WHEREAS, the Court ordered that objections to the proposed class action
4 settlement should be filed not later than Thursday, September 10, 2009, and that a fairness
5 hearing for final approval of the settlement should be held on Thursday, September 24, 2009;

6 WHEREAS, on September 10, 2009, Counsel for the County of Santa Clara filed
7 objections to the proposed class action settlement in this case ("Santa Clara Objections"), together
8 with a motion to intervene in this action ("Motion to Intervene");¹

9 WHEREAS, the County of Santa Clara noticed its Motion to Intervene for a
10 hearing on October 15, 2009;

11 WHEREAS, Plaintiffs, Defendant, and the County of Santa Clara agree that the
12 Motion to Intervene should be considered in connection with the Santa Clara Objections and the
13 Court's evaluation of the proposed class action settlement at the fairness hearing scheduled for
14 Thursday, September 24, 2009;

15 NOW, THEREFORE, IT IS HEREBY STIPULATED that Plaintiffs and
16 Defendant shall file any opposition to the Motion to Intervene not later than Friday, September
17 18, 2009; that the County of Santa Clara shall file any reply in support of the Motion to Intervene

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26 ¹ The County of Santa Clara has also filed a motion for administrative relief for an extension of
27 time to file amended or additional objections. *See* Dkt. No. 152. This stipulation does not affect
28 the County's motion for administrative relief, which remains pending before the Court, and to
which Plaintiffs and Defendant have responded, *see* Dkt. Nos. 158 & 160. Nor does it impose a
schedule for briefing in response to any objections that the Court may allow the County to file.

not later than Monday, September 21, 2009; and that a hearing on the Motion to Intervene shall be held in connection with the fairness hearing on Thursday, September 24, 2009, at 2:00 p.m.

IT IS SO STIPULATED.

DATED: September 15, 2009

MUNGER, TOLLES & OLSON LLP
Attorneys for Plaintiffs

By: /s/ Mark R. Conrad
MARK R. CONRAD

DATED: September 15, 2009

UNITED STATES ATTORNEY
JOSEPH P. RUSSONIELLO
Attorney for Defendant

By: /s/ Victoria R. Carradero
VICTORIA R. CARRADERO
ASSISTANT UNITED STATES ATTORNEY

DATED: September 15, 2009

OFFICE OF THE COUNTY COUNSEL
MIGUEL MÀRQUEZ
Attorney for County of Santa Clara

By: /s/ Tamara Lange
TAMARA LANGE
LEAD DEPUTY COUNTY COUNSEL

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: September 16, 2009


THE HONORABLE CLAUDIA WILKEN
United States District Judge